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June 5, 2023

By ECF

Hon. Michael A. Hammer, U.S.M.J.
United States District Court
District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

Re: *Industria de Alimentos Zenú S.A.S. v. Latinfood U.S. Corp. d/b/a Zenú Prods. Co., et al.*,
Civil Action No. 2:16-cv-6576-KM-MAH

Dear Judge Hammer:

We represent Plaintiff/Counter Defendant Industria de Alimentos Zenú S.A.S. and Third Party Defendant Cordialsa USA, Inc. We submit this letter, jointly with Latinfood U.S. Corp. and Wilson Zuluaga (the “Defendants”), pursuant to the Court’s April 24, 2023 Order [D.E. 292], directing the parties to file a joint status report informing the Court of the status of this litigation and any outstanding tasks to be completed.

There has been no substantive activity in the case since the time that the parties filed their last joint status report on April 21, 2023. We continue to await decision of the Court on the following motions, which have been fully submitted and remain pending:

- (1) The parties’ cross-motions for summary judgment, fully briefed as of December 22, 2022 (*see* ECF No. 280);
- (2) Defendants’ Objections to Magistrate Hammer’s May 26, 2022 Opinion and Order, fully briefed as of June 29, 2022 (*see* ECF No. 247); and
- (3) Defendants’ Objections to Magistrate Hammer’s July 27, 2022 Order, fully briefed as of August 23, 2022 (*see* ECF No. 261).

Determination of these outstanding motions will potentially streamline the matters at issue and thus enable the parties to identify any remaining tasks that require attention ahead of trial.

We thank the Court for its attention to this matter.

Respectfully submitted,

Peter D. Raymond